



Michael T. Caljouw, Senior Director
Public, Government, and Regulatory Affairs

December 14, 2009

Katherine Barrett
Health Care Quality and Cost Council
Two Boylston Street
Boston, MA 02116

Dear Ms. Barrett:

I am writing on behalf of Blue Cross Blue Shield of Massachusetts (BCBSMA) to offer comments regarding proposed changes to 129 CMR 3.00: Disclosure of Health Care Claims Data and Proposed Fees for Health Care Claims Data. BCBSMA commends the efforts of the Massachusetts Health Care Quality and Cost Council (QCC) for striking a balance between greater accessibility of the data and data privacy. We support the efforts of the QCC to implement strict guidelines concerning how any data is released. We look forward to continuing to partner with the QCC as we strive to protect the privacy and security of our members' data that is delivered each month to the QCC's technology representative, the Division of Health Care Finance and Policy.

BCBSMA believes that the statewide data warehouse effort, which has begun the process of standardizing the collection and reporting of a variety of health care information, is the first step in building a valuable tool for educating consumers, researchers, government agencies, and many others. However, it is vital that all health care information held by the QCC be vigilantly protected. This valuable data should be released *only* to those applicants who can show that they are able to meet every qualification specified in 129 CMR 3.00, including the proposed amendments, *and* who have the requisite technical and administrative capabilities. Our members, and the citizens of Massachusetts, deserve no less.

We endorse the QCC's efforts in this regard with the above caution. BCBSMA continues to believe that we can positively impact our members' health through the appropriate and legal use of data and consistent clinical programs focused on changing both the way care is provided and the quality metrics by which that care is delivered.

Thank you for your consideration.

Sincerely,

Michael Caljouw